General response:

DTSC is committed to ensuring a safe environment for all Californians, and Riverside Ag Park is included in that commitment. Approximately 1500 soil samples have been collected at the Riverside Ag Park Site (site), and over 200,000 tons of soil removed from the property. In the Spring of 2015, DTSC received an inquiry into the site from the CCAEJ. Subsequently, in September 2015, DTSC undertook a soil and groundwater sampling program that included collecting eighty-eight (88) discrete soil samples, representing 46 locations across the site, as well as eight duplicate samples for delivery to the DTSC contract laboratory. Additionally, two groundwater wells were installed and sampled to assess the current condition of groundwater beneath the site. The USEPA provided oversight for the surface soil sampling and collected co-located samples for delivery to their own laboratory. DTSC's zone contractor, The Source Group, provided contracting and logistical support; however, all samples were collected, handled and transported to the laboratory by DTSC staff.

Based on the September 2015 sampling results, DTSC, in conjunction with the USEPA, returned to the site in November 2015 to provide joint oversight for collecting an additional ~~144~~ 176 samples, including step out sampling of two identified locations with PCB concentrations higher than 1 milligrams per kilogram (mg/kg). The November 2015 sampling exercise indicated that additional cleanup work still needs to be completed before the site is ready for residential development.

Although there are some isolated areas of high concentrations of PCBs, most of the data show consistent low concentrations of PCBs across the site, as follows:

- 87 samples were either below the original cleanup level of 0.22 mg/kg or were not detected;
- 54 samples were between 0.22 mg/kg and 1 mg/kg. A concentration of 1 mg/kg is the DTSC and US EPA recommended health protective level; the 0.22 mg/kg used throughout the project is a conservative cleanup goal, rather than the ~~regional~~ health protective level;
- 31 samples were between 1 mg/kg and 50 mg/kg. A concentration of 50 mg/kg is the total threshold limit concentration for hazardous waste in California; and,
- 4 samples were above 50 mg/kg, and are all located in a single, isolated area (western gully) outside of the currently proposed development area.

Additionally, elevated PCB concentrations were detected more frequently in the south portion of the site (the fill area) versus the north portion of the site (the cut area).

It is not correct that the site cannot be developed and will have to be paved over. Instead, DTSC and USEPA are evaluating what additional cleanup will be needed for unrestricted use. If residential development plans fail, the property can remain in its

current condition as an undeveloped fenced lot, and does not pose health risk to occasional use (e.g., maintenance worker and trespasser scenarios) or to the surrounding community.

What happens now?

DTSC and the USEPA received the data report from the Developer for Riverside Ag (Friends of the Riverside Airport) in early January 2016. DTSC and EPA have subsequently met several times to evaluate the data and determine what the cleanup approach should be for the Developer. DTSC also met separately with the Developer to discuss the cleanup approach. On January 26, 2016, the USEPA, DTSC and the Developer met to discuss collectively a path forward.

What are the next steps?

Additional excavation is needed in some areas at the site before residential development is allowed. DTSC, in consultation with USEPA, has directed the Developer to provide a workplan that includes additional excavation at every point with a concentration greater than 0.22 mg/kg (the original cleanup level). The site will be treated differently based on whether it is a "cut" portion of the site or a "fill" portion. The cut portion (north half) has undergone soil removal to the underlying granite, in most places. The soil that was removed from the cut portion was then placed on the fill portion (south half) of the site.

Additional sampling will occur around each point in the cut portion that has concentrations of PCBs greater than 0.22 mg/kg. Based on sampling data, soil will be excavated in a minimum of fifty foot squares (one foot depth), until sampling indicates further excavation is not needed. Sampling will be similar for each point in the fill portion except that excavation will be squares of 120 feet (one foot depth). It is anticipated that between 2500 and 10,000 cubic feet of soil will be excavated at each elevated point in the cut portion, and about 14,400 cubic feet of soil will be excavated at each elevated point in the fill area. Similar sampling and soil removal is planned for the areas outside of the currently proposed development area.

In addition to sampling and excavation at each elevated point, soil sampling will also occur at each designated residential lot, outside of the footprint of planned homes. Depending upon the size of the lot, multiple soil samples will be collected from each lot (six locations on smaller lots and eight locations on larger lots). Sampling locations for each lot will be approved by DTSC with USEPA concurrence. If any additional concentrations above 0.22 mg/kg are identified during this lot by lot sampling program, additional soil removal will occur.

Given that DTSC previously certified the site as clean and now there is data showing that DTSC should never have certified it clean in the first place what happens? Who is responsible for this?

DTSC certified the site as clean based on existing information and the conceptual site model. This decision was made after more than 1,500 samples were collected and 200,000 tons of soil removed from the site. The recent sampling effort indicates the presence of an undiscovered pocket of PCBs in the soil. DTSC is requiring excavation of all points exceeding the original cleanup level of 0.22 mg/kg, to ensure attainment of an overall site exposure point concentration that will be significantly below the health protective level of 1 mg/kg PCBs.

Who is responsible for ensuring the neighborhood hasn't been negatively affected (from the dust, water, runoff, etc. – especially now that the data shows that the site is still contaminated).

The air monitoring records associated with the work of the developer were submitted as part of the Phase 1 and Phase 2 Response Plan Implementation Reports and were evaluated by DTSC as well as the South Coast Air Quality Management District. No negative impact to the community was indicated. The PCB levels detected in the recent sampling are generally lower than those removed during the Response Plan, and thus the current site condition does not pose health risk to the surrounding community.

Who is in charge of the cleanup now? Apparently the City and Developer are making plans, is DTSC involved anymore? Is US EPA involved?

DTSC, with assistance from the USEPA, remains in charge of the cleanup. DTSC and EPA have been actively involved in addressing the concerns from CCAEJ from Spring 2015 to present, including requiring additional field efforts and sample collection and analysis. On December 29, 2015, DTSC received an early draft of a report from the Developer's consultant that included verified data from the latest sampling effort conducted in November 2015. Subsequently, DTSC and EPA have been in discussion to determine the best path forward since receiving the data. Additionally, DTSC provided a briefing to City staff on January 20, and a briefing to CCAEJ on January 22, 2016. Discussions with the developer began the week of January 20 and concluded on January 26, 205 with a joint meeting between DTSC, USEPA and the Developer.

Commented [CJ1]: The final soil sampling report was dated Jan 6, 2016, so some clarification may be useful to avoid confusion.

While DTSC and USEPA agree that if no further work continues on the site, it can remain as a vacant land without risk to surrounding neighbors, the two agencies are currently working with the Developer to determine what additional cleanup will be needed for beneficial, unrestricted use of the site.